

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 25-cv-11221-WGY

DECLARATION OF TURNER SMITH

I, Turner Smith, an attorney admitted to practice before this Court, do hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Attorney General and Deputy Chief in the Office of the Attorney General for the Commonwealth of Massachusetts, and I appear on behalf of the Plaintiffs in this action.

2. I submit this declaration in support of Plaintiff States' Motion for a Summary Judgement, pursuant to Federal Rule of Civil Procedure 56.

3. The facts set forth herein are based upon my personal knowledge or a review of the files in my possession.

4. I have attached to this declaration true and correct copies of publicly promulgated or issued documents and factual declarations, as follows:

5. Attached hereto as Exhibit 1 is the declaration of Denise Barton of Massachusetts.

6. Attached hereto as Exhibit 2 is the declaration of Drew Bohan of California.

7. Attached hereto as Exhibit 3 is the declaration of Dr. Alison Brizius of Massachusetts.

8. Attached hereto as Exhibit 4 is the declaration of Kate Brouns of Washington.

9. Attached hereto as Exhibit 5 is the declaration of Michael Brown, Chief Executive Officer of SouthCoast Wind Energy LLC.

10. Attached hereto as Exhibit 6 is the declaration of Megan Brunatti of New Jersey.

11. Attached hereto as Exhibit 7 is the declaration of Mike Bull of Minnesota.

12. Attached hereto as Exhibit 8 is the declaration of Dan Burgess of Maine.

13. Attached hereto as Exhibit 9 is the declaration of Diane Butorac of Washington.

14. Attached hereto as Exhibit 10 is the declaration of Bruce K. Carlisle of Massachusetts.

15. Attached hereto as Exhibit 11 is the declaration of Joel Creswell of Washington.

16. Attached hereto as Exhibit 12 is the declaration of Katherine S. Dykes of Connecticut.

17. Attached hereto as Exhibit 13 is the declaration of Stephen Gawlik of New York.

18. Attached hereto as Exhibit 14 is the declaration of Brian P. Granahan of Illinois.

19. Attached hereto as Exhibit 15 is the declaration of Christopher R. Hoagland of Maryland.

20. Attached hereto as Exhibit 16 is the declaration of Nicole Hughes, Executive Director of Renewable Northwest.

21. Attached hereto as Exhibit 17 is the declaration of Douglas Jester of Michigan.

22. Attached hereto as Exhibit 18 is the declaration of Christopher Kearns of Rhode Island.

23. Attached hereto as Exhibit 19 is the declaration of Maureen Leddy of New York.

24. Attached hereto as Exhibit 20 is the declaration of Elizabeth Mahony of Massachusetts.

25. Attached hereto as Exhibit 21 is the declaration of Colin McConnaha of Oregon.

26. Attached hereto as Exhibit 22 is the declaration of Joseph-Thanh Nguyen of Washington.

27. Attached hereto as Exhibit 23 is the declaration of Joel Nightingale of Washington.

28. Attached hereto as Exhibit 24 is the declaration of Katherine Perry of New Jersey.

29. Attached hereto as Exhibit 25 is the declaration of Paul G. Pinsky of Maryland.

30. Attached hereto as Exhibit 26 is the declaration of Robyn Sahid of Arizona.

31. Attached hereto as Exhibit 27 is the declaration of Rebecca Stair of New Mexico.

32. Attached hereto as Exhibit 28 is the declaration of Dr. Will Toor of Colorado.

33. Attached hereto as Exhibit 29 is the declaration of Evan Vaughan, Executive Director of the Mid-Atlantic Renewable Energy Coalition (MAREC).

34. Attached hereto as Exhibit 30 is the declaration of John Williams of New York.

35. Attached hereto as Exhibit 31 is the declaration of Alan Zelenka of Oregon.

Dated: August 8, 2025
Boston, Massachusetts

/s/ Turner Helen Smith
Turner Smith, BBO No. 684750
Assistant Attorney General and Deputy Chief
Energy and Environment Bureau
Office of the Attorney General
Commonwealth of Massachusetts

CERTIFICATE OF SERVICE & RULE 7.1 CERTIFICATION

I, Nathaniel Haviland-Markowitz, certify that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF). I further certify that counsel for Plaintiffs conferred with counsel for Defendants, who have indicated they plan to oppose this motion.

/s/ Nathaniel Haviland-Markowitz
Nathaniel Haviland-Markowitz, BBO No. 713940
Assistant Attorney General
Energy and Environment Bureau
Office of the Attorney General
Commonwealth of Massachusetts